

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

TEXASLDPC INC.,)	
)	
Plaintiff,)	
)	
v.)	C.A. No. 18-1966 (RGA)
)	
BROADCOM INC., LSI CORPORATION)	
and AVAGO TECHNOLOGIES U.S., INC.)	
)	
Defendants.)	

DEFENDANTS' MOTION TO DISMISS

Pursuant to Fed. R. Civ. P. 12(b)(1) and 12(b)(6), Defendants Broadcom Inc., LSI Corp., and Avago Technologies U.S., Inc. (collectively, "Defendants") hereby move to dismiss Plaintiff TexasLDPC Inc.'s Amended Complaint (D.I. 9) with prejudice for lack of standing and for failure to state a claim on which relief can be granted. The grounds for this motion are fully set forth in Defendants' Opening Brief, submitted herewith.

MORRIS, NICHOLS, ARSHT & TUNNELL LLP

/s/ Jennifer A. Ward

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March 1, 2019

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PROPOSED ORDER

The Court, having considered Defendants Broadcom Inc., LSI Corp., and Avago Technologies U.S., Inc.’s (collectively, “Defendants”) Motion to Dismiss Pursuant to Fed. R. Civ. P. 12(b)(1) and 12(b)(6) (“Motion”), and the parties’ positions and arguments related thereto:

IT IS HEREBY ORDERED this _____ day of _____ 2019, that Defendants’ Motion is GRANTED and Plaintiff TexasLDPC Inc.’s Amended Complaint is dismissed with prejudice.

U.S.D.J.

CERTIFICATE OF SERVICE

I hereby certify that on March 1, 2019, I caused the foregoing to be electronically filed with the Clerk of the Court using CM/ECF, which will send notification of such filing to all registered participants.

I further certify that I caused copies of the foregoing document to be served on March 1, 2019, upon the following at the email addresses indicated below:

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